



U.S. Department of Justice

United States Attorney
Southern District of New York

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

November 14, 2024

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. All Assets and Funds Formerly Contained in Binance
Account ID 804093810, et al.*
24 Civ. 8559 (VSB)

Dear Judge Broderick:

The Government respectfully requests that the Court enter the attached Stipulation and Order in this matter. A civil forfeiture Complaint was filed on November 13, 2024 seeking the forfeiture of cryptocurrency formerly contained in a Binance account (the “Defendant-*in-rem*”). The Government and the owner of the subject Binance account have agreed to resolve their respective interests in the cryptocurrency formerly contained in the Binance account. As the proposed Stipulation and Order sets forth, the parties agree that the Government shall forfeit fifty (50) percent of the Defendant-*in-rem* and will return the other fifty percent to the owner of the subject Binance account.

Accordingly, the Government respectfully requests that the Court enter the Stipulation and Order.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/
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Enclosure